

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA**

Case No.: 1:25-cv-20757-JB/Torres

JANE DOE,

Plaintiff,

v.

STEVEN K. BONNELL II,

Defendant.

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DECLARATION OF ANDREW B. BRETTLER

I, Andrew B. Brettler, declare, pursuant to 28 U.S.C. § 1746, as follows:

1. I am an attorney admitted to practice *pro hac vice* in the above-captioned action. I am a partner at the law firm Berk Brettler LLP in West Hollywood, California. Along with our local counsel at Bilzin Sumberg Baena Price & Axelrod LLP, we represent Defendant Steven K. Bonnell II. I have personal knowledge of the matters contained herein and if called upon to testify could offer competent testimony thereto.

2. I submit this Declaration in opposition to Plaintiff's Motion for Entry of Order To Compel Non-Party Lolcow LLC To Remove Videos [ECF No. 80].

3. Attached hereto as **Exhibit A** is a true a correct copy of the Notice of Subpoena and Subpoena that Plaintiff issued to Lolcow, LLC on April 15, 2025.

4. Attached hereto as **Exhibit B** is a true and correct copy of my email exchange with Plaintiff's counsel, Joan S. Peters, on May 19, 2025.

5. Attached hereto as **Exhibit C** is a true and correct (partially redacted) copy of my further email exchange with Plaintiff's counsel, Joan S. Peters, on May 19 and May 20, 2025, in

which I inquired whether the Motion was sufficient to prevent the republication of the Video and in which I provided links to additional sexually explicit videos that Bonnell identified for removal from the KiwiFarms website. Plaintiff declined to consider that request unless Bonnell agreed to pay her.

6. Attached hereto as **Exhibit D** is a true and correct copy of the meet and confer correspondence I exchanged with Plaintiff's counsel and the draft motion and proposed order Plaintiff's counsel provided in connection with our meet and confer efforts. Plaintiff's emails and her draft motion are silent with respect to her demand for attorneys' fees and costs.

I declare, under penalty of perjury, that the foregoing is true and correct. Executed on May 30, 2025.

/s/ Andrew B. Brettler
Andrew B. Brettler